

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE**

THE UNITED STATES OF AMERICA

v.

No. 1:21-cr-41-JL-01

ARIA DIMEZZO

**ASSENTED-TO MOTION TO EXTEND DEADLINES
FOR DEFENSE AND GOVERNMENT**

The defense respectfully requests that the court extend by 14 days the defense deadline to file dispositive and evidentiary motions, and to similarly extend the government deadline to respond.

This case initially involved a multi-count indictment against six co-defendants. Three of those defendants have now entered pleas of guilty. The charges against a fourth defendant have been dismissed. Mr. Freeman and Ms. DiMezzo, counsel's client, have elected to go to trial. They face a 33-count superseding indictment, handed down in April.

Last December, prior to the superseding indictment, the parties proposed a trial schedule, including motion deadlines. Doc. 119. The court approved that schedule in an order on December 22, 2021. The schedule provided that defense dispositive or evidentiary motions would be filed by July 8, 2022, and government responses would be filed by August 3, 2022. The defense now asks to extend those two deadlines by 14 days.

Defense counsel seeks the extension because undersigned counsel for Ms. DiMezzo had COVID in June. Counsel was unable to work for roughly a week and his return was gradual. In addition, the volume of discovery, the superseding indictment, and the complicated legal issues have required greater time for research and analysis than anticipated.

The request is for an additional two weeks to research and prepare any motions. The parties do not anticipate that granting this motion will necessitate changing any other deadlines or affect the trial date.

Counsel for Mr. Freeman, Attorney Mark Sisti, joins in this request.

On behalf of the government, Assistant United States Attorney Georgianna MacDonald assents to this request.

WHEREFORE the defense requests that the court extend by 14 days the defense deadline to file dispositive and evidentiary motions, such that the new defense deadline is July 22, 2022, and similarly extend the government deadline to respond, to August 19, 2022.

Date: July 1, 2022.

Respectfully submitted by counsel
for Aria DiMezzo

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to registered participants identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the nonregistered participants on the date the document was signed by me.

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/s/ Richard Guerriero
Richard Guerriero, Esq.